Mr. John Bieker
Indiana Laminate
1224 N. Mill Street,
P.O. Box 270
Jasper, Indiana 47547

Re: 037-12356
First Significant Revision to
FESOP 037-10198-00084

Dear Mr. Bieker:

Indiana Laminate was issued a permit on June 24, 1997 for a furniture manufacturing plant. A letter requesting changes to this permit was received on June 12, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document Addendum.

The modification consists of adding an additional furniture manufacturing plant.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/MP

cc: File - Dubois County
U.S. EPA, Region V
Dubois County Health Department
Air Compliance Section Inspector - Gene Kelso
Compliance Data Section - Jerry Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Indiana Laminate
1101 West 100 South
Jasper, Indiana 47546

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F-037-10198-00084	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 24, 1999

First Significant Permit Revision: SPR-037-12356-00084 Pages affected: 3, 4, 4a, 5, 5a, 6, 6a, 26, 26a, 32, 32a, 32b, 32c, 32d	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates wood furniture manufacturing plant.

Authorized individual:	John Bieker
Source Address:	1101 West 100 South, Jasper, Indiana 47546
Mailing Address:	1224 N. Mill Street, P.O. Box 270, Jasper, Indiana 47547
Phone Number:	812-482-5727
SIC Code:	2511
Source Location Status:	Dubois County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) woodworking operation constructed on November 3, 1997, identified as EU #17 with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#2, and exhausting to one (1) stack, identified as SV#7.

(b) One (1) woodworking operation identified as EU #600 with a maximum capacity of 4,224 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#4, and exhausting to one (1) stack, identified as SV#600.

(c) One (1) spray booth identified as EU #622, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #622.

(d) One (1) spray booth identified as EU #618, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #618.

(e) One (1) spray booth identified as EU #620, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #620.

(f) One (1) spray booth identified as EU #628, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #628.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) spray booth constructed on July 24, 1996, identified as EU#16, utilizing high volume, low pressure spray application method and dryfilter control, spraying wood panels with a maximum of 0.964 pounds of powder glue/water mixture per hour and exhausting to one (1) stack, identified as SV#6.

(b) One (1) hot press glue spreader system constructed on March 8, 1996, identified as EU#15, with a maximum capacity of 3.33 plywood panels per hour and exhausting to one (1) stack, identified as SV#5.

(c) One (1) woodworking operation constructed on March 8, 1996, identified as EU #4 with a maximum capacity of 18,827 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#1, and exhausting to one (1) stack, identified as SV#4

(d) One (1) woodworking operation constructed on November 3, 1997, identified as EU #27

with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#3, and exhausting to one (1) stack, identified as SV#8.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Two (2) natural gas-fired heaters constructed on March 8, 1996, identified as EU#1 and EU#2, with a maximum heat input capacity of 0.8 million British Thermal Units (Btu) per hour each and exhausting to two (2) stacks, SV #1 and SV #2, respectively.

(2) One (1) natural gas-fired boiler constructed on March 8, 1996, identified as EU#3, with a maximum heat input capacity of 0.8 million Btu per hour connected to a stack, and exhausting to one (1) stack SV #3.

(3) One (1) natural gas-fired heater constructed on November 3, 1997, identified as EU #42, with a maximum heat input capacity of 0.8 million Btu per hour and exhausting to one (1) stack SV #9.

(4) Two (2) natural gas-fired heaters identified as NG #620 and NG #628, with a maximum heat input capacity of 1.296 million Btu per hour each and exhausting to two (2) stacks, SV #620a and SV #628a respectively.

(5) One (1) natural gas-fired heater identified as NG #618, with a maximum heat input capacity of 2.592 million Btu per hour each and exhausting to one (1) stack SV #618a.

(6) One (1) natural gas-fired boiler identified as NG #656, with a maximum heat input capacity of 0.65 million Btu per hour each and exhausting to one (1) stack SV #656.

(7) One (1) natural gas-fired heat identified as NG #660, with a maximum heat input capacity of 1.6 million Btu per hour and exhausting to one (1) stack SV #660.

(8) One (1) natural gas-fired air make-up unit identified as NG #658, with a maximum heat input capacity of 0.185 million Btu per hour each and exhausting to one (1) stack SV #658.

(9) Ten (10) natural gas-fired HVAC units identified as NG #636, NG #638, NG #640, NG #642, NG #644, NG #646, NG #648, NG #650, NG #652, and NG #654, with a maximum heat input capacity of 0.4 million Btu per hour each and exhausting to ten (10) stacks, SV #636, SV#638, SV #640, SV #642, SV #644, SV #646, SV #648, SV #650, SV #652, and SV #654, respectively.

(10) Two (2) natural gas-fired heaters identified as NG #630 and NG #632, with a maximum heat input capacity of 0.12 million Btu per hour each and exhausting to two (2) stacks, SV #630 and SV #632, respectively.

(11) One (1) natural gas-fired heater constructed on identified as NG #634, with a maximum heat input capacity of 0.06 million Btu per hour each and exhausting to one (1) stack SV #634.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(h) The following equipment related to manufacturing activities not resulting in emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

(i) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(j) Paved and unpaved roads and parking lots with public access.

(k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(l) On-site fire and emergency response training approved by the department.

(m) Other activities or categories not previously identified:

(1) CL2370 Booth Coat used in the Veneer Spray Booth, identified as EU#16, emitting less than 3 lbs/hr or 15 lbs/day of VOC.

(2) Two (2) above ground storage tanks constructed on March 8, 1996, identified as 527 and 528, each with a maximum capacity of 1900 gallons.

A.4 FESOP Applicability

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) woodworking operation constructed on November 3, 1997, identified as EU#17, with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#2, and exhausting to one (1) stack, identified as SV#7.

(b) One (1) woodworking operation, identified as EU #600 with a maximum capacity of 4,224 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#4, and exhausting to one (1) stack, identified as SV#600.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking stack/vent SV#7 shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 12.34 pounds per hour.

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities stack/vent SV#600 shall be limited to 0.03 grain per dry standard cubic foot equivalent to 15.7 pounds per hour.

D.1.2 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking stack/vent SV #7, including both filterable and condensible fractions shall not exceed 4.85 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(b) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking stack/vent SV#600, including both filterable and condensible fractions shall not exceed 4.85 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter

The baghouses for PM control shall be in operation at all times when the woodworking stations are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking operations stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant Activities

Facility Description [326 IAC 2-8-4(10)]:
Two (2) natural gas-fired heaters constructed on March 8, 1996, identified as EU#1 and EU#2, with a maximum heat input capacity of 0.8 million British Thermal Units (Btu) per hour each and exhausting to two (2) stacks, SV #1 and SV #2, respectively.

One (1) natural gas-fired boiler constructed on March 8, 1996, identified as EU#3, with a maximum heat input capacity of 0.8 million Btu per hour connected to a stack, and exhausting to one (1) stack SV #3.

One (1) natural gas-fired heater constructed on November 3, 1997, identified as EU #42, with a maximum heat input capacity of 0.8 million Btu per hour and exhausting to one (1) stack SV #9.

Two (2) natural gas-fired heaters identified as NG #620 and NG #628, with a maximum heat input capacity of 1.296 million Btu per hour each and exhausting to two (2) stacks, SV #620a and SV #628a respectively.

One (1) natural gas-fired heater identified as NG #618, with a maximum heat input capacity of 2.592 million Btu per hour each and exhausting to one (1) stack SV #618a.

One (1) natural gas-fired boiler identified as NG #656, with a maximum heat input capacity of 0.65 million Btu per hour each and exhausting to one (1) stack SV #656.

One (1) natural gas-fired heat identified as NG #660, with a maximum heat input capacity of 1.6 million Btu per hour and exhausting to one (1) stack SV #660.

One (1) natural gas-fired air make-up unit identified as NG #658, with a maximum heat input capacity of 0.185 million Btu per hour each and exhausting to one (1) stack SV #658.

Ten (10) natural gas-fired HVAC units identified as NG #636, NG #638, NG #640, NG #642, NG #644, NG #646, NG #648, NG #650, NG #652, and NG #654, with a maximum heat input capacity of 0.4 million Btu per hour each and exhausting to ten (10) stacks, SV#636, SV#638, SV#640, SV#642, SV#644, SV#646, SV#648, SV#650, SV#652, and SV#654, respectively.

Two (2) natural gas-fired heaters identified as NG #630 and NG #632, with a maximum heat input capacity of 0.12 million Btu per hour each and exhausting to two (2) stacks, SV #630 and SV #632 respectively.

One (1) natural gas-fired heater identified as NG #634, with a maximum heat input capacity of 0.06 million Btu per hour each and exhausting to one (1) stack SV #634.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-1(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from natural gas combustion shall be limited to 0.01 grain per dry standard cubic foot.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) spray booth, identified as EU #618, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #618.

(b) One (1) spray booth, identified as EU #620, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #620.

(c) One (1) spray booth, identified as EU #622, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #622.

(d) One (1) spray booth, identified as EU #628, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #628.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.5.2 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#618 shall be limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU#618 shall be limited to 2.05 tons per year.

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#620 shall be

limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU#620 shall be limited to 1.00 tons per year.

(c) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#622 shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 1.95 pounds per hour.

(d) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#628 shall be limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU#628 shall be limited to 1.00 tons per year.

D.5.3 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #618, including both filterable and condensible fractions shall not exceed 0.468 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(b) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #620, including both filterable and condensible fractions shall not exceed 0.228 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(c) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #622, including both filterable and condensible fractions shall not exceed 1.95 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(d) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #628, including both filterable and condensible fractions shall not exceed 0.228 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control device.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.6 Particulate Matter (PM)

The dry filter control for PM control shall be in place and controlling overspray emissions at all times when the spray booths, (EU #618, EU #620, EU #622, EU #628) are in operation.

D.5.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV #618, SV #620, SV #622, SV #628) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.8 Record Keeping Requirements

(a) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under D.5.7.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Indiana Laminate**
Source Location:	**1101 West 100 South, Jasper, Indiana 47546**
County:	**Dubois**
SIC Code:	**2511**
Operation Permit No.:	**037-10198-00084**
Operation Permit Issuance Date:	**June 24, 1999**
Permit Modification No.:	**F-037-12356-00084**
Permit Reviewer:	**ERG/MP**

On August 28, 2000, the Office of Air Management (OAM) had a notice published in the The Herald, Jasper, Indiana, stating that Indiana Laminate had applied for a revision to their Federally Enforceable State Operating Permit (FESOP) to operate a furniture manufacturing plant with control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 22, 2000, Indiana Laminate submitted comments on the proposed FESOP revision. The summary of the comments is as follows:

Comment 1:

In the past the stack numbers were used for identification instead of the emission unit number. This conflicts with existing Title V permits used in other facilities, which could cause some confusion when training new employees.

Response to Comment 1:

The permit has been changed as follows:

D.1.2 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking **stack/vent SV #7** ~~operation EU #17~~, including both filterable and condensible fractions shall not exceed 4.85 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(b) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking **stack/vent SV#600** ~~operating EU #600~~, including both filterable and condensible fractions shall not exceed 4.85 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

Comment 2:

On page 32d of 36, section D.5.8(a) it specifies to look for inspection records pertaining to D.5.6. Since D.5.6 does not deal with an inspection we thought you might be referring to D.5.7 on the daily inspections of the placement, integrity and particle loading of the filters.

Response to Comment 2:

The permit has been changed as follows:

D.5.8 Record Keeping Requirements

(a) To document compliance with Condition D.5.**7**~~6~~, the Permittee shall maintain records of the results of the inspections required under D.5.**7**~~6~~.

Upon further review, the OAM has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as strikeouts, new language is bolded):

D.5.6 Particulate Matter (PM)

The dry filter control for PM control shall be in **place and controlling overspray emissions** ~~operation~~ at all times when the spray booths, (EU #618, EU #620, EU #622, EU #628) are in operation.

OAM staff also commented on the applicability of 6-1-2(a) (Nonattainment Area Particulate Limitations) for this source. While Dubois county is no longer nonattainment, the rule applies to PM sources in Dubois county which have the potential to emit one hundred (100) tons per year or more of particulate matter and therefore applies to this facility.

Indiana Department of Environmental Management (IDEM)
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**Indiana Laminate**
Source Location:	**1101 West 100 South, Jasper, Indiana 47546**
County:	**Dubois**
SIC Code:	**2511**
Operation Permit No.:	**037-10198-00084**
Operation Permit Issuance Date:	**June 24, 1999**
Permit Modification No.:	**F-037-12356-00084**
Permit Reviewer:	**ERG/MP**

The Office of Air Management (OAM) has reviewed a revision application from Indiana Laminate relating to the operation of a furniture manufacturing facility. The proposed addition consists of the following emission units and pollution control devices:

(a) One (1) woodworking operation identified as EU #600 with a maximum capacity of 4,224 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#4, and exhausting to one (1) stack, identified as SV#600.

(b) One (1) spray booth on identified as EU #618, utilizing high volume, low pressure spray application method and dry filter control, coating a maximum of 20 units of wood office furniture per hour and exhausting to one (1) stack, identified as SV #618.

(c) One (1) spray booth on identified as EU #620, utilizing high volume, low pressure spray application method and dry filter control, coating a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #620.

(d) One (1) spray booth identified as EU #622, utilizing high volume, low pressure spray application method and dry filter control, coating a maximum of 20 units of wood office furniture per hour and exhausting to one (1) stack, identified as SV #622.

(e) One (1) spray booth identified as EU #628, utilizing high volume, low pressure spray application method and dry filter control, coating a maximum of 20 units of wood office furniture per hour and exhausting to one (1) stack, identified as SV #628.

The proposed addition also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(f) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Two (2) natural gas-fired heaters identified as NG #620 and NG #628, with a maximum heat input capacity of 1.296 million Btu per hour each and exhausting to two (2) stacks, SV #620a and SV #628a respectively.

(2) One (1) natural gas-fired heater identified as NG #618, with a maximum heat input capacity of 2.592 million Btu per hour each and exhausting to one (1) stack SV #618a.

(3) One (1) natural gas-fired boiler identified as NG #656, with a maximum heat input capacity of 0.65 million Btu per hour each and exhausting to one (1) stack SV #656.

(4) One (1) natural gas-fired heater identified as NG #660, with a maximum heat input capacity of 1.6 million Btu per hour and exhausting to one (1) stack SV #660.

(5) One (1) natural gas-fired air make-up unit identified as NG #658, with a maximum heat input capacity of 0.185 million Btu per hour each and exhausting to one (1) stack SV #658.

(6) Ten (10) natural gas-fired HVAC units identified as NG #636, NG #638, NG #640, NG #642, NG #644, NG #646, NG #648, NG #650, NG #652, and NG #654, with a maximum heat input capacity of 0.4 million Btu per hour each and exhausting to ten (10) stacks, SV #636, SV #638, SV #640, SV #642, SV #644, SV #646, SV #648, SV #650, SV #652, and SV #654, respectively.

(7) Two (2) natural gas-fired heaters identified as NG #630 and NG #632, with a maximum heat input capacity of 0.12 million Btu per hour each and exhausting to two (2) stacks, SV #630 and SV #632, respectively.

(8) One (1) natural gas-fired heater identified as NG #634, with a maximum heat input capacity of 0.06 million Btu per hour each and exhausting to one (1) stack SV #634.

History

On June 12, 2000, Indiana Laminate submitted an application to the OAM requesting to add an additional furniture manufacturing facility to their existing plant. Indiana Laminate was issued a Federally Enforceable State Operating Permit (FESOP) on June 24, 1999.

Existing Approvals

The source was issued a FESOP (F-037-10198-00084) on June 24, 1999. There have been no changes to the FESOP to date.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	Woodworking	24	2	61,000	Ambient
2	SAP/NGR Booth	29	2.3	32,000	Ambient
3	Stain/Rim Seal	29	2.3	16,000	Ambient
4	Finish Booth	29	2.8	7,600	Ambient
5 and 6	Flash Chamber	27	0.7	375	100 Deg
7	Off-line Finish	29	2.3	16,000	Ambient
8,9,10	Gas Heater	26	0.7	375	100 Deg
11 thru 20	HVAC	26	0.7	375	100 Deg
21	Boiler	26	0.8	375	100 Deg
22	Air Make-up	26	2	1260	Ambient
23	Oven	26	1.5	1260	100 Deg

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 12, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A pages 1 through 12).

Potential To Emit of the Proposed Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.” .

Pollutant	Potential To Emit (tons/year)
PM	2,774
PM-10	2,774
SO_2	0.03
VOC	69.86
CO	4.39
NO_x	5.22

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Total HAPs	0.73

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM-10) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The proposed modification is considered a significant permit revision as the PTE of the modification exceeds the threshold levels in 326 IAC 2-8-11.1(F)(1)(E).

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
woodworking operation with baghouse CE#1*	39.42	13.14	0	0	0	0	0
woodworking operation with baghouse CE#2*	54.06	21.2	0	0	0	0	0
woodworking operation with baghouse CE#3*	39.42	13.14	0	0	0	0	0
spray booth EU#16*	9.30	11.26	0	0	0	0	1.00
natural gas combustion EU#1, EU#2, EU#3, EU#42*	1.00	1.00	0	1.00	2.00	2.00	0
Other insignificant activities*	5.00	5.00	5.00	5.00	5.00	5.00	1.00
Spray booth EU #618	2.05	2.05	0	2.64	0	0	0.25
Spray booth EU #620	1.00	1.00	0	0.99	0	0	0.20
Spray booth EU #622	8.56**	8.56**	0	65.72	0	0	0
Spray booth EU #628	1.00	1.00	0	0.22	0	0	0.19
woodworking operation (EU#600) with baghouse CE#4	68.8	21.2	0	0	0	0	0
Natural gas combustion (19 units)	0.04	0.4	0.03	0.29	4.39	5.22	0.10
Total Emissions	231.97	98.95	5.03	75.86	11.39	12.22	2.74

*Existing Units. In order to maintain FESOP status, the PM-10 limit for CE#2 was reduced from 55.46 tpy to

21.2 tpy to accommodate the PM-10 of the new units.
** PM/PM-10 as limited by 326 IAC 6-1-2(a).

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) Indiana Laminate is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, (NESHAPs), Subpart JJ as it is not a major source as defined in 40 CFR Part 63.2.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on June 12, 2000. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on June 12, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Woodworking

326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities (EU#600) shall be limited to 0.03 grain per dry standard cubic foot which is equivalent to 15.7 pounds per hour (68.8 tpy) of emissions.

326 IAC 6-1-9 Nonattainment Area Particulate Limitations for Dubois County

Pursuant to 326 IAC 6-1-9 Nonattainment Area Particulate Limitations for Dubois County does not apply to this source, because Indiana Laminate is not one of the listed sources for Dubois County.

326 IAC 2-8-4 Particulate Matter 10 Microns (PM-10)

Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking operations (EU#600) shall not exceed 4.85 pounds per hour (21.2 tpy), including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. See Appendix A for documentation on how the PM-10 limits were developed.

State Rule Applicability - Surface Coating

326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations) particulate matter (PM) emissions from the surface coating facilities shall be limited to 0.03 grain per dry standard cubic foot.

For EU #618, this limit is equivalent to 8.23 pounds per hour (36 tons per year) of emissions. The maximum potential to emit for this spray booth is 2.05 tons per year which is in compliance with this limit.

For EU #620, this limit is equivalent to 4.11 pounds per hour (18 tons per year) of emissions. The maximum potential to emit for this spray booth is 0.65 tons per year which is in compliance with this limit.

For EU #622, this limit is equivalent to 1.95 pounds per hour (8.6 tons per year) of emissions. The maximum potential to emit for this spray booth is 22 tons per year. However, after the application of controls (dry filters operating at 85% efficiency), the emissions are 3.4 tons per year which is in compliance with this limit.

For EU #628, this limit is equivalent to 4.11 pounds per hour (18 tons per year) of emissions. The maximum potential to emit for this spray booth is 0.04 tons per year which is in compliance with this limit.

In order to comply with these limits, the dry filters shall be in operation at all times the spray booths are in operation.

326 IAC 8-2-12 Wood Furniture and Cabinet Coating

This modification is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) as the emission levels (15 pounds of VOC per day) in 326 IAC 8-2-1(a)(4) are expected to be exceeded. Pursuant to this rule, all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall be applied using one of the specified application systems. The use of HVLP spray guns satisfies this requirement.

326 IAC 2-8-4 Particulate Matter 10 Microns (PM-10)

Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating operation EU #618 shall not exceed 0.468 pounds per hour (2.05 tpy), including both filterable and condensible fractions.

Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating operation EU#620 shall not exceed 0.228 pounds per hour (1.00 tpy), including both filterable and condensible fractions.

Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating operation EU#622 shall not exceed 1.95 pounds per hour (8.56 tpy), including both filterable and condensible fractions.

Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating operation EU#628 shall not exceed 0.228 pounds per hour (1.00 tpy), including both filterable and condensible fractions.

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. See Appendix A for documentation on how the PM-10 limits were developed.

State Rule Applicability - Combustion Sources

326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from natural gas combustion (NG #656) shall be limited to 0.01 grain per dry standard cubic foot.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking operation, identified as Unit #600 has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the woodworking operation stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouse for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP).

Proposed Changes

Proposed changes to the existing permit are provided below using the bold and strikeout method. A new D Section (D.5) has been added the permit for the four (4) new spray booths.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) woodworking operation constructed on November 3, 1997, identified as EU #17 with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#2, and exhausting to one (1) stack, identified as SV#7.

(b) One (1) woodworking operation identified as EU #600 with a maximum capacity of 4,224 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#4, and exhausting to one (1) stack, identified as SV#600.

(c) One (1) spray booth identified as EU #622, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #622.

(d) One (1) spray booth identified as EU #618, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #618.

(e) One (1) spray booth identified as EU #620, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #620.

(f) One (1) spray booth identified as EU #628, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #628.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) spray booth constructed on July 24, 1996, identified as EU#16, utilizing high volume, low pressure spray application method and dryfilter control, spraying wood panels with a maximum of 0.964 pounds of powder glue/water mixture per hour and exhausting to one (1) stack, identified as SV#6.

(b) One (1) hot press glue spreader system constructed on March 8, 1996, identified as EU#15, with a maximum capacity of 3.33 plywood panels per hour and exhausting to one (1) stack, identified as SV#5.

(c) One (1) woodworking operation constructed on March 8, 1996, identified as EU #4 with a maximum capacity of 18,827 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#1, and exhausting to one (1) stack, identified as SV#4.

(d) One (1) woodworking operation constructed on November 3, 1997, identified as EU #27 with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#3, and exhausting to one (1) stack, identified as SV#8.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) Two (2) natural gas-fired heaters constructed on March 8, 1996, identified as EU#1 and EU#2, with a maximum heat input capacity of 0.8 million British Thermal Units (Btu) per hour each and exhausting to two (2) stacks, SV #1 and SV #2, respectively.

(2) One (1) natural gas-fired boiler constructed on March 8, 1996, identified as EU#3, with a maximum heat input capacity of 0.8 million Btu per hour connected to a stack, and exhausting to one (1) stack SV #3.

(3) One (1) natural gas-fired heater constructed on November 3, 1997, identified as EU #42, with a maximum heat input capacity of 0.8 million Btu per hour and exhausting to one (1) stack SV #9.

(4) Two (2) natural gas-fired heaters identified as NG #620 and NG #628, with a maximum heat input capacity of 1.296 million Btu per hour each and exhausting to two (2) stacks, SV #620a and SV #628a respectively.

(5) One (1) natural gas-fired heater identified as NG #618, with a maximum heat input capacity of 2.592 million Btu per hour each and exhausting to one (1) stack SV #618a.

(6) One (1) natural gas-fired boiler identified as NG #656, with a maximum heat input capacity of 0.65 million Btu per hour each and exhausting to one (1) stack SV #656.

(7) One (1) natural gas-fired heat identified as NG #660, with a maximum heat input capacity of 1.6 million Btu per hour and exhausting to one (1) stack SV #660.

(8) One (1) natural gas-fired air make-up unit identified as NG #658, with a maximum heat input capacity of 0.185 million Btu per hour each and exhausting to one (1) stack SV #658.

(9) Ten (10) natural gas-fired HVAC units identified as NG #636, NG #638, NG #640, NG #642, NG #644, NG #646, NG #648, NG #650, NG #652, and NG #654, with a maximum heat input capacity of 0.4 million Btu per hour each and exhausting to ten (10) stacks, SV #636, SV#638, SV #640, SV #642, SV #644, SV #646, SV #648, SV #650, SV #652, and SV #654, respectively.

(10) Two (2) natural gas-fired heaters identified as NG #630 and NG #632, with a maximum heat input capacity of 0.12 million Btu per hour each and exhausting to two (2) stacks, SV #630 and SV #632, respectively.

(11) One (1) natural gas-fired heater constructed on identified as NG #634, with a maximum heat input capacity of 0.06 million Btu per hour each and exhausting to one (1) stack SV #634.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(h) The following equipment related to manufacturing activities not resulting in emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

(i) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(j) Paved and unpaved roads and parking lots with public access.

(k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(l) On-site fire and emergency response training approved by the department.

(m) Other activities or categories not previously identified:

(1) CL2370 Booth Coat used in the Veneer Spray Booth, identified as EU#16, emitting less than 3 lbs/hr or 15 lbs/day of VOC.

(2) Two (2) above ground storage tanks constructed on March 8, 1996, identified as 527 and 528, each with a maximum capacity of 1900 gallons.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) woodworking operation constructed on November 3, 1997, identified as EU#17, with a maximum capacity of 9,414 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#2, and exhausting to one (1) stack, identified as SV#7.

(b) One (1) woodworking operation, identified as EU #600 with a maximum capacity of 4,224 pounds of plywood panels for office furniture per hour, with emissions controlled by one (1) baghouse, identified as CE#4, and exhausting to one (1) stack, identified as SV#600.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking stack/vent SV#7 shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 12.34 pounds per hour.

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities stack/vent SV#600 shall be limited to 0.03 grain per dry standard cubic foot equivalent to 15.7 pounds per hour.

D.1.2 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking operation EU #17, including both filterable and condensible fractions shall not exceed ~~12.66~~ **4.85** pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(b) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the woodworking operating EU #600, including both filterable and condensible fractions shall not exceed 4.85 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

D.1.5 Particulate Matter

The baghouses for PM control shall be in operation at all times when the woodworking **stations are** ~~is~~ in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant Activities

Facility Description [326 IAC 2-8-4(10)]:
Two (2) natural gas-fired heaters constructed on March 8, 1996, identified as EU#1 and EU#2, with a maximum heat input capacity of 0.8 million British Thermal Units (Btu) per hour each and exhausting to two (2) stacks, SV #1 and SV #2, respectively.

One (1) natural gas-fired boiler constructed on March 8, 1996, identified as EU#3, with a maximum heat input capacity of 0.8 million Btu per hour connected to a stack, and exhausting to one (1) stack SV #3.

One (1) natural gas-fired heater constructed on November 3, 1997, identified as EU #42, with a maximum heat input capacity of 0.8 million Btu per hour and exhausting to one (1) stack SV #9.

Two (2) natural gas-fired heaters identified as NG #620 and NG #628, with a maximum heat input capacity of 1.296 million Btu per hour each and exhausting to two (2) stacks, SV #620a and SV #628a respectively.

One (1) natural gas-fired heater identified as NG #618, with a maximum heat input capacity of 2.592 million Btu per hour each and exhausting to one (1) stack SV #618a.

One (1) natural gas-fired boiler identified as NG #656, with a maximum heat input capacity of 0.65 million Btu per hour each and exhausting to one (1) stack SV #656.

One (1) natural gas-fired heater identified as NG #660, with a maximum heat input capacity of 1.6 million Btu per hour and exhausting to one (1) stack SV #660.

One (1) natural gas-fired air make-up unit identified as NG #658, with a maximum heat input capacity of 0.185 million Btu per hour each and exhausting to one (1) stack SV #658.

Ten (10) natural gas-fired HVAC units identified as NG #636, NG #638, NG #640, NG #642, NG #644, NG #646, NG #648, NG #650, NG #652, and NG #654, with a maximum heat input capacity of 0.4 million Btu per hour each and exhausting to ten (10) stacks, SV#636, SV#638, SV#640, SV#642, SV#644, SV#646, SV#648, SV#650, SV#652, and SV#654, respectively.

Two (2) natural gas-fired heaters identified as NG #630 and NG #632, with a maximum heat input capacity of 0.12 million Btu per hour each and exhausting to two (2) stacks, SV #630 and SV #632 respectively.

One (1) natural gas-fired heater identified as NG #634, with a maximum heat input capacity of 0.06 million Btu per hour each and exhausting to one (1) stack SV #634.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) spray booth, identified as EU #618, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #618.

(b) One (1) spray booth, identified as EU #620, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #620.

(c) One (1) spray booth, identified as EU #622, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #622.

(d) One (1) spray booth, identified as EU #628, utilizing high volume, low pressure spray application method and dry filter control, spraying wood office furniture with a maximum of 20 units per hour and exhausting to one (1) stack, identified as SV #628.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.5.2 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#618 shall be limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU #618 shall be limited to 2.05 tons per year.

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#620 shall be limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU #620 shall be limited to 1 ton per year.

(c) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#622 shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 1.95 pounds per hour.

(d) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities stack/vent SV#628 shall be limited to 0.03 grain per dry standard cubic foot. Total PM emissions from EU #628 shall be limited to 1 ton per year.

D.5.3 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #618, including both filterable and condensible fractions shall not exceed 0.468 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(b) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #620, including both filterable and condensible fractions shall not exceed 0.228 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(c) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #622, including both filterable and condensible fractions shall not exceed 1.95 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

(d) Pursuant to 326 IAC 2-8-4 particulate matter 10 microns emissions from the surface coating facilities stack/vent SV #628, including both filterable and condensible fractions shall not exceed 0.228 pounds per hour. Therefore; the Part 70 rules (326 IAC 2-7) do not apply.

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control device.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.6 Particulate Matter (PM)

The dry filter control for PM control shall be in operation at all times when the spray booths, (EU #618, EU #620, EU #622, EU #628) are in operation.

D.5.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV #618, SV #620, SV #622, SV #628) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.8 Record Keeping Requirements

(a) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under D.5.7.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The operation of this Furniture manufacturing facility shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision, Permit No. F-037-12356-00084.